

FILED - USDC-NH  
2025 JUL 14 PM 9:57

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW HAMPSHIRE

Frank Staples, et al.,  
Plaintiffs,

v.

Christopher Sununu, in his individual capacity, et al.,  
Defendants.

Case No. 1:24-cv-00331-LM-TSM

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PLAINTIFFS' MOTION FOR EXTENSION OF TIME TO RESPOND TO DEFENDANTS'  
MOTION TO DISMISS FIRST AMENDED COMPLAINT

NOW COME the Plaintiffs, Frank Staples and Kathleen Bussiere, pro se, and respectfully move this Honorable Court for a ninety (90) day extension of time to file their response to the Defendants' Motion to Dismiss (Document 60), currently due on July 14, 2025. In support of this motion, Plaintiffs state as follows:

1. The Plaintiffs require additional time to coordinate and prepare their opposition due to significant logistical constraints. Plaintiff Kathleen Bussiere resides in Massachusetts, while Plaintiff Frank Staples resides in central-northern New Hampshire. Coordination has been hampered by distance and limited availability for in-person or synchronous collaboration.
2. Plaintiff Frank Staples also respectfully notifies the Court that he is entitled to, and requests accommodation under, the Americans with Disabilities Act (ADA). Due to documented impairments that impact cognitive processing and executive functioning speed, additional time is required to prepare and organize a proper and complete response. The requested extension is consistent with ADA provisions and intended to ensure equal access to the legal process.
3. The Motion to Dismiss raises complex legal issues involving multiple constitutional claims and state actors, and Plaintiffs require adequate time to research, draft, and confer on both factual and legal responses.
4. No party will be prejudiced by the extension. This is Plaintiffs' first request for additional time in response to the Defendants' motion, and the request is made in good faith and not for purposes of delay.
5. Plaintiffs therefore respectfully request that the Court extend the deadline for their response to the Defendants' Motion to Dismiss from July 14, 2025 to October 14, 2025.

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WHEREFORE, Plaintiffs respectfully request that this Honorable Court:

Grant a 90-day extension of time, up to and including October 14, 2025, to file their response to Defendants' Motion to Dismiss the First Amended Complaint (Document 60); and

Grant such further relief as the Court deems just and proper.

Respectfully submitted,



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Date: July 14th, 2025

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#### CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing motion has been served via the Court's CM/ECF system on all counsel of record and via certified mail to any unregistered parties on July 14th, 2025.



Frank Staples

/s/ Kathleen Bussiere (Electronic Signature)